



FW: Oshkosh - P limitation

Sachs, Richard P - DNR

to:

John Wiemhoff

10/24/2012 08:12 AM

Hide Details

From: "Sachs, Richard P - DNR" <Richard.Sachs@wisconsin.gov>

To: John Wiemhoff/R5/USEPA/US@EPA,

History: This message has been replied to and forwarded.

John,

With regard to your question on when a TMDL for Lake Winnebago can be expected, see the reply below from Rob McLennan, who is heading up the effort to develop that TMDL. Suffice it to say, the plans are to develop that TMDL within the term of the next permit for the Oshkosh WWTF – presently proposed to expire in late 2017. I hope that helps you understand DNR's approach of using the TMDL to set phosphorus effluent limits for the Oshkosh WWTF based upon Lake Winnebago. Please contact me if you have any further questions.

Sincerely,

Dick Sachs

Wastewater Specialist

Wisconsin Department of Natural Resources

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From: McLennan, Robin - DNR

Sent: Wednesday, October 24, 2012 7:53 AM

To: Sachs, Richard P - DNR

Subject: RE: Osh Kosh - P limitation

Dick, at this point I'd say sometime mid-2014....or possibly later in the year.

From: Sachs, Richard P - DNR

Sent: Monday, October 22, 2012 4:10 PM

To: McLennan, Robin - DNR

Cc: O'Connor, Kelley S - DNR; Mugan, Tom J - DNR

Subject: FW: Osh Kosh - P limitation

Rob,

EPA is now taking a second look at the P limits in the proposed Oshkosh permit (which were based upon the criteria for the Fox River at the point of discharge). We purposely did not attempt to base them upon the criteria for Lake Winnebago, as doing so would require something analogous to a TMDL. And since a TMDL is in the works we reasoned we could wait to use that 'right tool for the job' as it is imminent. EPA is questioning when we can expect the TMDL for Lake Winnebago to be complete. Can you provide an answer?

Thanks,
Dick

From: Wiemhoff.John@epamail.epa.gov [<mailto:Wiemhoff.John@epamail.epa.gov>]
Sent: Monday, October 22, 2012 1:55 PM
To: Sachs, Richard P - DNR
Subject: Fw: Osh Kosh - P limitation

FYI

----- Forwarded by John Wiemhoff/R5/USEPA/US on 10/22/2012 01:54 PM -----

From: David Werbach/R5/USEPA/US
To: Stephen Jann/R5/USEPA/US@EPA,
Cc: John Wiemhoff/R5/USEPA/US@EPA, kuefler.patrick@epa.gov
Date: 10/22/2012 01:48 PM
Subject: Re: Osh Kosh - P limitation

Lake Winnebago is listed on the 2012 draft list as impaired due to low DO, eutrophication, and turbidity. Pollutant cause are sediment and total phosphorus. As far as I can tell, the Fox River between Lake Butte Des Morts and Lake Winnebago is not listed for TP, only for PAH just upstream of Lake Winnebago (a 1/2 mile stretch).

From: Stephen Jann/R5/USEPA/US
To: John Wiemhoff/R5/USEPA/US@EPA,
Cc: David Werbach/R5/USEPA/US@EPA, kuefler.patrick@epa.gov
Date: 10/22/2012 01:28 PM
Subject: Re: Osh Kosh - P limitation

Thanks, John. I'm leaning heavily toward the position that the limit needs to be set based on the L. Winnebago WQC. The Fox River data indicate that the river does not have capacity to assimilate P prior to the river entering the lake. Please check with WWB to see if the lake is on the State's 303(d) list.

Stephen M. Jann
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From: John Wiemhoff/R5/USEPA/US
 To: Stephen Jann/R5/USEPA/US@EPA,
 Cc: David Werbach/R5/USEPA/US@EPA, kuefler.patrick@epa.gov
 Date: 10/22/2012 01:13 PM
 Subject: Osh Kosh - P limitation

Attached is the second question/my response following our WI Phosphorus meeting this morning. The final resolution may be dependent upon Dave Werbach's response to the first question.

Per the WQBEL documentation provided by WDNR,

1. WQ criteria for the Fox River in vicinity of Osh Kosh is **100 ug/l** (0.1 mg/l)
2. The median of 13 sampled P concentrations taken in the Fox River near the Osh Kosh outfall = **85 ug/l** (0.085 mg/l)
3. The $7Q_2$ in the Fox River = **1,350 cfs**
4. The design flow of the Osh Kosh WWTP is 20 MGD (**31 cfs**)
5. The WDNR calculated P WQBEL, based on the mass balanced calculations using the above data, is **0.75 mg/l**.
- 6.

Based on the above, and information on the historical WWTP sampled P levels of 0.67 mg/l from the WWTP's effluent, the plant can meet the WQBEL (proposed effluent limitation) of 0.75 mg/l.

If Lake Winnebago (1.25 miles downstream) drives the effluent P limit (where the effluent would have to meet a .04 mg/l limit), it would be a major game changer.

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----- Forwarded by John Wiemhoff/R5/USEPA/US on 10/22/2012 12:52 PM -----

From: John Wiemhoff/R5/USEPA/US
 To: David Werbach/R5/USEPA/US@EPA,
 Cc: Stephen Jann/R5/USEPA/US@EPA
 Date: 10/22/2012 12:34 PM
 Subject: Re: Request for Information

Thanks again Dave.

The discharge of Osh Kosh's primary WWTP effluent pipe occurs within the Fox River, downstream of Lake Buttes des Morts, but upstream about 1.25 miles from Lake Winnebago.

Steve Jann suggested that I check on 2 things:

1. **Which WQ standards for P would apply based on the 1.25 mile upstream of Lake Winnebago? A) the river WQ standard for the Fox River, or 2) the WQ standard for Lake Winnebago (listed as 0.04 mg./l)**
- 2.
2. Check on the levels of P in the Fox River (at appropriate low level condition within the vicinity of the Osh Kosh outfall) which would be used for the mass balance to assist in the determination of what the WQBEL for P should be for the Osh Kosh effluent.

Thanks

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From: David Werbach/R5/USEPA/US
 To: John Wiemhoff/R5/USEPA/US@EPA,
 Date: 07/27/2012 08:37 AM
 Subject: Re: Request for Information

From: John Wiemhoff/R5/USEPA/US
 To: Werbach.david@Epa.gov,
 Date: 07/26/2012 09:50 PM
 Subject: Request for Information

David:

I am reviewing a permit of **Osh Kosh WI which discharges to the Fox River immediately before it enters Lake Winnebago.**

1. Do you know if there is a TMDL for this area and downstream stretch of river and Lake?

A TMDL was approved for the Lower Fox starting at the outlet from Lake Winnebago. We did not

develop any specific WLAs for any facilities upstream of the lake, but the TMDL is based upon a general 40% reduction in phosphorus and TSS loads in Lake Winnebago.

2. Is this stretch an impaired water and if so, what are the impairments?

Lake Winnebago is impaired for total phosphorus, TSS, mercury and PCBs. The Fox River at Oshkosh is listed for PAH's

Thanks

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